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October 23, 2020

VIA ECF

Honorable George B. Daniels  
United States District Court Judge  
United States District Court for the Southern District of New York  
500 Pearl Street, Room 1310  
New York, New York 10007

**SO ORDERED:**

*George B. Daniels*  
**George B. Daniels, U.S.D.J.**

Re: Virtu Financial, Inc. v. Axis Insurance Company,  
Case No. 1:20-cv-06293-GBD

**Dated:** OCT 26 2020

Dear Judge Daniels:

On behalf of AXIS Insurance Co. ("AXIS"), we write pursuant to Your Honor's Individual Rules of Practice (Rule I.D.ii) respectfully to request permission to redact certain information and file certain documents under seal in connection with its Opposition to Plaintiffs Virtu Financial, Inc., and Virtu Americas, LLC ("Virtu")'s Motion for Partial Summary Judgment and AXIS's Cross-Motion for Partial Summary Judgment.

On October 19, 2020, the Court granted Virtu's request to redact certain sensitive information from its Motion for Partial Summary Judgment. In AXIS's Opposition to Plaintiff's Motion for Partial Summary Judgment and AXIS's Cross-Motion for Partial Summary Judgment we have referred to elements of that same information. Further, Virtu has requested that AXIS redact personally-identifying information, including the names of the Virtu employees who were targeted by the conduct at issue and any information designated as confidential information when Virtu filed materials under seal and when Virtu produced materials to AXIS during the claim submission process.

Accordingly, on these grounds, AXIS respectfully requests this Court grant it permission to redact and file the documents that include the materials described above under seal.

Respectfully submitted,

/s/ Joseph G. Finnerty III  
Joseph G. Finnerty III

cc: Robin Cohen, Esq. (counsel for plaintiff)  
All counsel of record via ECF